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REDACTED, FOR PUBLIC INSPECTION

September 27, 2018

VIA EMAIL

Karen Peltz Strauss
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

**RE: Request for Confidential Treatment
Follow Up Questions on At-Home VRS Call Handling
CG Docket Nos. 10-51, 03-123**

Dear Ms. Strauss:

ZVRS Holding Company, parent company of CSDVRS, LLC d/b/a ZVRS (“ZVRS”) and Purple Communications, Inc. (“Purple”), hereby submits on behalf of ZVRS and Purple the following responses to information you requested regarding at-home call handling via email on September 5, 2018.

Pursuant to 47 C.F.R. §§ 0.457, 0.459, ZVRS and Purple request that the Commission provide confidential treatment for the company-specific, highly-sensitive and proprietary commercial information in the attached letter and withhold that information from public inspection. The confidential information constitutes highly-sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act (“FOIA”).

In support of this request and pursuant to Section 0.459(b) of the Commission’s rules, ZVRS and Purple hereby state as follows:

1. Identification of the specific information for which confidential treatment is sought.

ZVRS and Purple request confidential treatment of the following responses providing corporate proprietary information on ZVRS and Purple.

2. Identification of the circumstance giving rise to the submission.

ZVRS and Purple are submitting this information in response to a September 5, 2018 email inquiry from Karen Strauss with respect to data submitted in ZVRS and Purple’s six-month reports on their participation in the Commission’s at-home VRS call handling pilot program.

3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.

The confidential information in the data requested is highly-sensitive commercial information specific to the operations and strategies of ZVRS and Purple. This information is generally safeguarded from competitors and is not made available to the public.



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4. Explanation of the degree to which the information concerns a service that is subject to competition.

The confidential information involves VRS, a nationwide competitive service.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

Disclosure of the information included in the letter could cause substantial competitive harm to ZVRS and Purple, because it would provide competitors insight into ZVRS's and Purple's confidential operational and strategy information, which would work to ZVRS's and Purple's severe competitive disadvantage.

6. Identification of any measures taken to prevent unauthorized disclosure.

ZVRS and Purple routinely treat the information provided in the following letter as highly confidential and exercise significant care to ensure that such information is not disclosed to competitors or the public.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

ZVRS and Purple do not make the data provided in the following letter available to the public, and this information has not been previously disclosed to third parties, except where required by the Commission and the TRS Fund Administrator, each of whom protect the confidentiality of such submissions.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

ZVRS and Purple request that the information identified in the following letter be treated as being confidential on an indefinite basis, as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to ZVRS and Purple.

Respectfully submitted,

/s/Gregory Hlibok
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Officer
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Enclosures

Confidential Response to CGB Staff Inquiry

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